



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

US EPA RECORDS CENTER REGION 5



474107

REPLY TO THE ATTENTION OF

VIA FIRST CLASS MAIL

October 23, 2006

Mr. Paul Bucholtz
Project Manager
Remediation and Redevelopment Division
Michigan Department of Environmental Quality
Constitution Hall – 3rd Floor South
P.O. Box 30426
Lansing, Michigan 48909

RE: Request for State Applicable and Relevant and Appropriate Requirements (ARARs) for the Allied Paper/Portage Creek/Kalamazoo River Superfund Site, Plainwell Impoundment - Plainwell, Allegan County, Michigan

Dear Mr. Bucholtz:

This letter requests that the Michigan Department of Environmental Quality identify all Applicable, Relevant, and Appropriate Requirements (ARARs) for the potential upcoming removal actions at the Allied Paper/Portage Creek/Kalamazoo River Superfund Site, Plainwell Impoundment, located in Plainwell, Michigan. Any State ARARs identified in a timely manner for this removal action will be complied with to the extent practicable.

The United States Environmental Protection Agency (U.S. EPA) is in the process of preparing an Action Memorandum to conduct Time Critical Removal Actions within the Plainwell Impoundment portion of the Kalamazoo River. The removal action will include:

- 1) Dredging and/or excavation of PCB contaminated sediments behind the Plainwell Dam; in the 3 discrete sediment areas identified mid-channel; and within 40 feet from the existing bank.
- 2) Cut-back and stabilization of river banks to mitigate exposures to PCB contaminated banks and future erosion;
- 3) Removal of PCB contaminated floodplain soils in excess of 50 mg/kg PCBs;
- 4) Removal of the floodplain areas where residential exposure to PCB contaminated floodplain soils is in excess of 4 mg/kg PCBs, the Michigan residential standard for PCBs in soil;
- 5) Dewatering, as necessary, and disposal of all PCB contaminated sediment and bank and floodplain soils removed pursuant to ¶¶ 1-4 above into existing landfills located at the Allied Paper operable unit of the Site;

- 6) The use of clean soils excavated as part of the bank cutback work to cover floodplain soils contaminated above human health or ecological risk levels;
- 7) An evaluation of the impact of removing PCB contaminated sediments abutting the Plainwell Dam on the dam's structural integrity be completed prior to removing these sediments;
- 8) An evaluation of whether a temporary or permanent lowering of the water level within the river may minimize movement of PCB contaminated sediments during construction and/or the erosion of banks and floodplains covered with clean soils;
- 9) If appropriate in light of the evaluations in 7) and 8), removal of one or more portions of the Plainwell Dam structure as needed to reduce the risk of sudden failure of the Plainwell Dam and/or minimize short- and long-term PCB mobilization from banks and floodplains.
- 10) This response action shall ensure that a stable river channel exists post-removal, re-vegetation with native plant species occurs, and that appropriate monitoring both during and after the response action is undertaken.

This response action is the result of a negotiated agreement between Mellinnium Holdings LLC (MHLLC) and Georgia Pacific Corporation (GP), State of Michigan and the United States Environmental Protection Agency (USEPA). The work proposed above is anticipated to be completed by MHLLC and GP with oversight conducted by the State of Michigan and USEPA.

If you have any questions regarding this letter, please feel free to contact me at (312) 353-8360. Thank you for your assistance in this matter.

Sincerely,



Sam Borries
USEPA On-Scene Coordinator

cc: Mike Harris, USEPA